

New Jersey Cannabis Regulatory Commission
Public In-Writing Comments
Public Meeting: March 18, 2025

Full Name	Meeting Date	Comment
Pascale Vazquez	3/18/2025	<p>Greetings.</p> <p style="text-align: center;">TABLE OF CONTENT</p> <p>1. Additional clinical research (R & D) of the cannabis production industries .</p> <p>As we may know the side effects of cannabis or may have heard through the grapevine that the consumption of cannabis gives an increased appetite. Many cannabis users are not experiencing an increase in their appetite. Marijuana has many components of strains , that look, smell, burn and burn differently, but some how has a white dusty coding sprinkled on 7 different strains. The other known fact of cannabis in history and of the current era, marijuana has a side effect of making one feel like they are on cloud nine. My research confirms that the production of the marijuana products are not getting the job done. Where and how are the cannabis plants produced.</p> <p>Conclusion: Extensive research and investigative studies, by independent laboratories needs conduction.</p> <p>2.The equality of a diverse NJ population on ownership and operations of cannabis dispensaries.</p> <p>Before the final legalization of cannabis, main and social media platforms focused on allowing the underserved people that was unlawfully exploited, imprisoned, harassed would be the first to receive permits and licenses for the operational and ownership of dispensaries, during my research on dispensary and smoke shops, the media hype, was just that! The state of NJ lost a lawsuit on discrimination of equality against African Americans and was ordered by the judge to play fair and by some huge crack in the system , the state of NJ remains steady fast on defiance of a judge's ruling. African Americans are not getting the opportunity they deserve and was promised if marijuana was legalized and the powers that be are not playing by the rule, even by their own.</p> <p>Conclusion: Nj State need to own up to their involvement on promises that were made a have to oblige by the rulings of the discrimination lawsuit they lost by not playing by the rules. An extensive amount of smoke shops and dispensaries have opened up</p>

		<p>in under-served communities , in which the underserved people in those communities are not given an opportunity to invest in and for their communities. Revenue of sales in the underserved (unfortunate) communities are focused in investing in their communities. Addressing how and why the state of NJ is not obligated to follow court rulings. Additionally, some of the provisions of disbursement of cannabis revenue should be In the form of grants allotted to the underserved people in their underserved neighborhoods.</p> <p>* The upcoming meeting in March 4th will address licensing and permits. This taboo topic cannot be a pile of dirt underneath a carpet.*</p> <p>3. Expungement of all marijuana convictions, in marijuana legalized states.</p> <p>One of the many discriminated laws told that would be forgiven, if voted yes for legalization, was the expungement of records and convictions of the possession, consumption and/or use of marijuana. Only if the person shows up in court and go through the process, but for those who do not show up to do so, will still have a marijuana conviction on their permanent records. The system knows who was convicted for marijuana and should expunge those convicted records automatically.</p> <p>4. Disbursement of proceeds from the cannabis industry.</p> <p>The underserved people and their communities has been the most affected by the injustices surrounding cannabis and they should have been the first to get an opportunity to own and operate a cannabis dispensary as was talked about and promised if marijuana was legalized, its show time.</p>
Scott Mino	3/18/2025	<p>Wondering why the state and commission are still holding Adult Use licenses back from approval, when there are only 61 thousand medical patients signed up for the medical program. Since Adult Use licenses have been awarded and open the medical program continues to see number decline monthly.</p> <p>Wondering when the state will push more Adult Use licenses, since the medical program is continuing to lose patients monthly. With only having around 61K patients for medical, state seems positioned to approve more adult use licenses but needed on a faster more improved timeline. What is the commissions thought process regarding declining medical patients and more need for adult use locations to combat the black market, and build a more robust industry for the Garden State?</p>
Brianna Sager	3/18/2025	<p>Fair contract</p> <p>Fair pay , raises , clarity on tips accrued in a day .</p>

Curaleaf		
Kelli McCormick Curaleaf		<p>I am writing tonight to ask for assistance. In 2023 the CRC voted to not renew the AU license for Curaleaf. Commissioner Krista Nash stated business must Maintain a labor Peace Agreement, Unions must be given unhindered access to employees and that a Collective Bargaining Agreement Must be negotiated with 200 days. As of 4/18/2025 it is 694 days. Curaleaf is still not complying with the law. Curaleaf has dug in their heels from day one when it came to the union. We even had to attend Anti-Union Meetings on two occasions where Curaleaf told us how bad it would be if we voted to Unionize. Hours have been cut drastically for full time employees. Curaleaf is also trying to strong arm everyone into giving full availability, if you do not have full availability they have been cutting hours even more. I am full time and have been since I started in Aug. 2020, a few weeks ago my hours were cut to 24.5 hrs.</p> <p>Curaleaf has not given raised to their employees in years stating that they cannot give raises while negotiating with the Union. On 1/28/2025 UFCW Local 360 sent Curaleaf a letter letting them know the Union will not stand in the way of Curaleaf giving raises. We still have not been given a raise in pay.</p> <p>694 DAYS! Please help us and hold Curaleaf accountable. As Commissioner Nash stated "It's time that we favor people over Profits"</p> <p>Thank you for your time, Kelli McCormick</p>
Lauren Pippitt		<p>Commissioner Krista Nash,</p> <p>I would like to request your assistance in holding Curaleaf accountable for the conditions surrounding their 2023 license renewals. I am referencing you in the CRC emergency meeting on April 17, 2023. According to the CREAMM Act and your own statements, a bargaining agreement must be negotiated within 200 days of startup. Curaleaf has not demonstrated good faith in these negotiations, particularly by holding our pay increases hostage during what we believe are insincere negotiations with our union. We have yet to reach any kind of bargaining agreement with Curaleaf, resulting in years of stagnation.</p> <p>When you stated, "It is time that we favor people over profits," it resonated deeply. Unfortunately, this stands in stark contrast to Curaleaf's actions.</p> <p>We urgently need your help. Curaleaf is severely abusing its corporate power and prioritizing greed in New Jersey, seemingly exploiting every opportunity for maximum profit. They must be held accountable to comply with the state laws and regulations established by the CRC, and it is essential that workers are protected in this process.</p>

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Brianna Sager Curaleaf	3/18/2025	<p>Commissioner Krista Nash,</p> <p>I would like to request your assistance in holding Curaleaf accountable for the conditions surrounding their 2023 license renewals. I am referencing you in the CRC emergency meeting on April 17, 2023.</p> <p>According to the CREAMM Act and your own statements, a bargaining agreement must be negotiated within 200 days of startup. Curaleaf has not demonstrated good faith in these negotiations, particularly by holding our pay increases hostage during what we believe are insincere negotiations with our union. We have yet to reach any kind of bargaining agreement with Curaleaf, resulting in years of stagnation.</p> <p>When you stated, "It is time that we favor people over profits," it resonated deeply. Unfortunately, this stands in stark contrast to Curaleaf's actions.</p> <p>We urgently need your help. Curaleaf is severely abusing its corporate power and prioritizing greed in New Jersey, seemingly exploiting every opportunity for maximum profit. They must be held accountable to comply with the state laws and regulations established by the CRC, and it is essential that workers are protected in this process.</p> <p>Thank you for your attention to this matter.</p>
Brian Peeke Curaleaf	3/18/2025	<p>Commissioner Krista Nash,</p> <p>I would like to request your assistance in holding Curaleaf accountable for the conditions surrounding their 2023 license renewals. I am referencing you in the CRC emergency meeting on April 17th 2023.</p> <p>According to the CREAMM Act and your own statements, a bargaining agreement must be negotiated within two hundred days of start up. Curaleaf has not demonstrated "good faith" in these negotiations, particularly by holding our pay increases hostage during what we believe are insincere negotiations with our union. We have yet to reach any kind of bargaining agreement with Curaleaf resulting in (over two) years of stagnation.</p> <p>When you stated, " It is time that we favor people over profits, " it resonated deeply. Unfortunately, this stands in stark contrast to Curaleaf's actions.</p> <p>We urgently need your help. Curaleaf is severely abusing its corporate power and prioritizing GREED in New Jersey, seemingly exploiting every opportunity for maximum profit. They must be held accountable to comply with the state laws and regulations established by the CRC, and it is essential that workers are protected in this process.</p> <p>Thank you for your attention to this matter.</p> <p>Best Regards,</p>

		Brian Peeke
Jennifer Staffenberg Curaleaf		<p>Commissioner Krista Nash,</p> <p>I am an employee working at the Bellmawr Curaleaf retail location and I'm in need of your assistance in holding Curaleaf accountable. You stated in your comments at the CRC emergency meeting on April 17th 2023, that according to the CREAMM Act a bargaining agreement must be negotiated within two hundred days of start up. We have been in "negotiations" with Curaleaf for over two years. (over 730 days).</p> <p>They have not demonstrated any sort of "good faith" in these negotiations.</p> <p>No raises have been provided to anyone in all these years. Curaleaf has demonstrated and implemented clear union busting strategies including; using their own leads (who are covered in this union) to convince anyone they can against it, as well as having leads report back any talk of accountability for the company.</p> <p>Any employee that has stood up or pushed back regarding the union have quickly been fired or retaliated against so severely they have quit. This has mostly affected our most vulnerable employees including those in the LGBT community, women and those of color.</p> <p>We urgently need your help. Curaleaf is severely abusing its corporate power and prioritizing GREED in New Jersey, seemingly exploiting every opportunity for maximum profit. They must be held accountable to comply with the state laws and regulations established by the CRC, and it is essential that workers are protected in this process.</p> <p>Thank you for your attention to this matter.</p> <p>Best Regards, Jennifer Staffenberg</p>
Van Ryker		<p>I would like to request your assistance in holding Curaleaf accountable for the conditions surrounding their 2023 license renewals. I am referencing you in the CRC emergency meeting on April 17th 2023. According to the CREAMM Act and your own statements, a bargaining agreement must be negotiated within two hundred days of start up. Curaleaf has not demonstrated "good faith" in these negotiations, particularly by holding our play increases hostage during what we believe are insincere negotiations with our union. We have yet to reach any kind of bargaining agreement with Curaleaf resulting in (over two) years of stagnation.</p> <p>When you stated, " It is time that we favor people over profits, " it resonated deeply. Unfortunately, this stands in stark contrast to Curaleaf's actions.</p>

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Duncan Markovich Better Ways LLC	3/18/2025	<p>To the New Jersey Cannabis Regulatory Commission,</p> <p>My name is Duncan Markovich, founder and owner of Better Ways, a cannabis therapeutics, education, and community center in my hometown of Branford, Connecticut.</p> <p>I appreciate this opportunity today to share with you my support for S1393 and creating a framework for medical cannabis patients to have home grow rights.</p> <p>New Jersey is one of only a handful of states that does not authorize home grow. I know there are many here in New Jersey and in our great cannabis community around the country that are equally puzzled by this mentality that tomatoes are legal now, but you can only get them at our restaurants and grocery stores. I hope you can see the hypocrisy. The majority of the states that have home grow cultivation rights for medical and recreational users have the continued sales numbers on both sides of the fence to illustrate that market flux and loss to licensed operators is a fallacy. Do grocery stores and restaurants go out of business due to back yard gardens and small-scale farms? No. So why the inconsistencies with cannabis?</p> <p>I use cannabis daily for pain management and nerve damage after a surgical complication resulting from my 4th open heart surgery in 2010 so I know far too well when there is a disruption in the quality and consistency of my cannabis.</p> <p>Protecting a medical cannabis patient's right to home cultivation is a no brainer. It affords them access to cultivars they know aid their specific concerns. It also gives them the indescribable experience of growing something and caring for it for its medicinal benefits down the road. The mental health improvements when I am cultivating anything whether it be a cucumber or some Kush, that is an avenue we need to explore in greater detail and impact. More often these strains are not prioritized in commercial sized grows. In my humble opinion true medicinal grade cannabis is craft only. Small cultivation operators will be the ones to</p>

		<p>shine brightest in this emerging industry for they will have the far superior quality due to care and attention versus mass grown mediocrity.</p> <p>The relationship an individual has with the natural world especially when it comes to providing oneself medicine is an inalienable right that we all have and no government should dictate anything otherwise.</p> <p>The conundrum unfolding in this country as cannabis legalizes is the plague that regulatory capture guided by high paid tobacco and alcohol lobbyists for megacorporation's is blinding legislators from the original reason that this plant was legalized in the first place – to provide a plant-based medicine to those seeking an alternative to relying on the yoke of the pharmaceutical industry and its attached side effects.</p> <p>I also wanted to share my thoughts and concerns for this emerging industry as well.</p> <p>There is a significant lack of meritocracy when it comes to licensure award. Far too often we see multistate operators boast lots of money to secure licensing but at the end of the day they are proving themselves to be predatory in tactics and operations more concerned about profits over patients. It is a privilege and honor to work with this plant and it's supporting community. We are also a highly self-regulating community so please utilize us as the needed checks and balances also essential for the democratic mechanism to function properly and this emerging industry to sustainably and ethically grow in tandem.</p> <p>Thank you for your time and attention,</p> <p>I welcome any questions or comments from this commission.</p> <p>Duncan Markovich – Branford, CT</p> <p>Owner and Founder - Better Ways LLC, A Cannabis Education and Community Center</p> <p>Multistate Cannabis Activist and Speaker</p>
Andrea Raible The Safe Leaf Society		<p>After over a year of advocating for safety reforms and transparency with no response from the CRC, I helped form the Safe Leaf Society to provide secret shopper testing, a pathway for whistleblowers, and enable data-driven regulation. This information and more can be found at safeleafsociety.com</p> <p>Introduction</p> <p>-The purpose of this study was to assess the quality and regulatory compliance of pre-roll cannabis products sold in licensed Cannabis Regulatory Commission (CRC) dispensaries in New Jersey.</p>

		<p>-The evaluation focused on microbial contamination and cannabinoid potency accuracy to determine adherence to NJCRC standards and highlight regulatory gaps.</p> <p>Sample Collection</p> <ul style="list-style-type: none"> -A total of 25 pre-rolls were collected from licensed CRC dispensaries. -To minimize cost, pre-rolls ranging from 1g to 2.5g were selected. -Due to the lack of direct information linking products to license holders, a diverse selection of brands and product lines was chosen to represent different licensed cultivators. -The purchasers requested Certificates of Analysis (COAs) at the point of sale, though none were provided/available during purchase. (COAs were not readily available at the point of sale for any of the purchased products. Metrc laboratory data was collected for 22 of the 25 products after elevations in requests. The remaining 3 products' labels were evaluated based on the label claim.) -Of the 25 pre-rolls collected: <ul style="list-style-type: none"> -17 different licensed businesses were identified as product sources -8 pre-rolls contained sufficient material for cannabinoid potency analysis in addition to microbial testing. <p>Observations</p> <ul style="list-style-type: none"> -One product labeled as a terpene-infused pre-roll was determined to be a distillate infused pre-roll based on consistency and reported laboratory results. -Inconsistent labeling was noted between products purchased for active ingredients and other requirements. -In one instance, the licensed business ID was not listed on the label. <p>Testing Methodology</p> <p>All samples tested by a reputable CRC licensed, ISO accredited testing facility as personal use for the following:</p> <ol style="list-style-type: none"> 1) Microbial Contamination Analysis <ul style="list-style-type: none"> -Samples were analyzed for Total Aerobic Bacteria and Total Yeast & Mold using validated culture-based test methods. -NJCRC sets microbial limits for cannabis products to ensure consumer safety at 100,000 CFU/g for both analyses. 2) Cannabinoid Potency Analysis <ul style="list-style-type: none"> -If sufficient material remained after microbial testing, potency analysis was conducted to verify compliance with NJCRC labeling variance standards, which is set at $\pm 10\%$. <p>Results: Microbial Contamination</p> <ul style="list-style-type: none"> - 7 out of 25 pre-rolls (28%) failed due to exceeding microbial limits set by NJCRC. -Failures are spread across 5 separate cultivation licensees
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		<p>-66.7% mold failure original reported tym at “0” cfu/g within 4 months of retesting</p> <p>Results: Potency Variance</p> <ul style="list-style-type: none"> - All 8 pre-rolls tested for cannabinoid potency failed to meet NJCRC’s acceptable labeling variance requirements. - 6 different licensees accounted for <p>Discussion – Widespread Issues</p> <ul style="list-style-type: none"> -Results indicate that failures are not limited to a single cultivator but are systemic across the industry, more indicative of lab shopping. -The findings raise significant concerns about product quality, regulatory compliance, and consumer transparency in New Jersey’s legal cannabis market. -The high failure rate for microbial contamination suggests potential lapses in testing laboratory oversight, cultivation practices, and enforcement of labeling standards. -Lack of NJCRC enforcement allows questionable lab practices to persist, undermining consumer trust. -Similar patterns observed in other states where labs manipulate results to secure business from producers. -The absence of COAs at the point of sale further exacerbates transparency issues, preventing consumers from making informed purchasing decisions. <p>Recommendations:</p> <p>Standardized Testing & Reference Lab Development: Establish a reference laboratory to conduct testing upon request upon request by the CRC and mitigate discrepancies across the industry.</p> <p>-Improve COA Availability: Enforce existing mandate that dispensaries provide COAs to consumers upon request. Create a publicly-accessible centralized database of all NJ COAs.</p> <p>(Industry Member Recommendations: Designate time during CRC required training to address COA specific education for new workers. Post COAs online or send them to The Safe Leaf Society for public availability.)</p> <p>Increased Surveillance & Compliance Checks: Implement routine product testing and audits to identify and address regulatory violations.</p> <p>Enforcement of NJCRC Testing Standards: Strengthen oversight of cannabis laboratories to ensure all products comply with microbial safety and potency labeling requirements.</p> <p>Independent Audits of Labs: Routinely auditing labs allow for the detection and correction of fraudulent testing practices.</p> <p>Conclusion</p> <p>This study highlights the need for stricter regulatory enforcement on laboratories, improved product testing consistency, and greater</p>
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		consumer access to quality assurance data in New Jersey's cannabis market. Addressing these issues will enhance consumer safety, industry credibility, and regulatory compliance. Thank you for your time and consideration.
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